

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00167-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LG ELECTRONICS INC., LG
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 6:21-cv-00168-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 6:21-cv-00169-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 6:21-cv-00361-ADA

SONRAI MEMORY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-401-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KINGSTON TECHNOLOGY COMPANY,
INC. and KINGSTON TECHNOLOGY
CORPORATION

Defendant.

Case No. 6:21-cv-01284-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

AMAZON.COM, INC.

Defendant.

Case No. 6:21-cv-00991-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KIOXIA CORPORATION and KIOXIA
AMERICA, INC.

Defendants.

Case No. 6:21-cv-00400-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,
INC.

Defendants.

Case No. 6:21-cv-01168-ADA

**DECLARATION OF CARRIE WILLIAMSON IN SUPPORT OF
DEFENDANTS' OPPOSED MOTION TO STAY
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Carrie Williamson, hereby declare as follows:

1. I am an attorney at DLA Piper LLP (US), counsel of record in this action for Defendants Kioxia Corporation and Kioxia America, Inc. I am a member of the Bar of the State of California and have been admitted to appear pro hac vice in the case of *Sonrai Memory Ltd. v. Kioxia Corp. et al*, Case No. 6:21-cv-00400-ADA. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's August 17, 2021, initial infringement chart for U.S. Patent No. 6,724,241 (the "'241 patent") against Kioxia Corporation and Kioxia America, Inc.

3. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's July 15, 2021, initial infringement contentions for the '241 patent against Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (together, "Samsung").

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's August 17, 2021, initial infringement contentions for the '241 patent against Dell Technologies Inc.

5. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff's August 17, 2021, initial infringement contentions for the '241 patent against Apple Inc.

6. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff's July 15, 2021, initial infringement contentions for the '241 patent against Google LLC.

7. Attached hereto as **Exhibit F** is a true and correct copy of Plaintiff's July 15, 2021, initial infringement contentions for the '241 patent against LG Electronics Inc. and LG Electronics U.S.A., Inc.

8. Attached hereto as **Exhibit G** is a true and correct copy of Plaintiff's November 19, 2021, initial infringement contentions for the '241 patent against Western Digital.

9. Attached hereto as **Exhibit H** is a true and correct copy of Plaintiff Sonrai's Response to the Court's Order to Show Cause Concerning Transfer to the Western District of Texas, filed in *Sonrai Memory Ltd. v. Western Digital Technologies, Inc.*, 21-cv-01040-CJC (JDEx) (C.D. Cal), Dkt. 52 (Oct. 8, 2021).

10. Attached hereto as **Exhibit I** is a true and correct copy of Plaintiff's September 13, 2021, amended infringement contentions for the '241 patent against Samsung as to the accused Samsung chips.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Los Altos, California, on December 22, 2021.

Carrie L. Williamson
CARRIE L. WILLIAMSON